UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

IN RE:

HAROLD EUGENE BARNES

EVA DARLENE BARNES

2325 ACR 2212

Palestine, TX 75803

xxx-xx-2064; xxx-xx-9276

Debtor(s)

\$ CASE NO. 22-60466

CHAPTER 7

OBJECTION TO MOTION OF US BANK FOR RELIEF FROM THE AUTOMATIC STAY

COMES NOW HAROLD EUGENE BARNES and EVA DARLENE BARNES, Debtors in the above styled and numbered cause and in Objection to the Motion for Relief from the Automatic Stay filed by US BANK ("Movant"), and would respectfully show the following:

- 1. The allegations of US BANK in paragraphs 1 through 4 are admitted.
- 2. The other allegations of US BANK in paragraphs 5 through 11 are denied.
- 3. Except as stated above, the Debtors generally deny the allegations contained in Movant's Motion.

WHEREFORE, PREMISES CONSIDERED, Debtors respectfully pray that the Court deny all relief requested by Movant, and for such other relief in law and equity as the Court deems just.

DATED: May 4, 2023.

Respectfully submitted,

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By: /s/ Michael P. Wallace
Michael P. Wallace
State Bar No. 20771030
ATTORNEYS FOR DEBTOR(S)

CERTTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of May 2023, a true and correct copy of the foregoing was served on all parties listed below by electronic means or via United States First-Class Mail.

DIANE CARTER 660 NORTH CENTRAL EXPRESSWAY STE 101 PLANO, TX 75074

CARSON EMMONS 4004 BELT LINE ROAD SUITE 100 ADDISON, TEXAS 75001

HAROLD EUGENE BARNES 2325 AN COUNTY ROAD 2212 PALESTINE, TX 75803-1069

EVA DARLENE BARNES 2325 AN COUNTY ROAD 2212 PALESTINE, TX 75803-1069

US TRUSTEE: 110 N. COLLEGE AVE SUITE 300 TYLER, TX 75702

ANDERSON COUNTY JULIE ANNE PARSONS PO BOX 1269 ROUND ROCK, TX 78680

PRA RECEIVABLES MANAGEMENT, LLC PO BOX 41021 NORFOLK, VA 23541

/s/ Michael P. Wallace
Michael P. Wallace